

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

| | | |
|--------------------------|---|------------------------------|
| UNITED STATES OF AMERICA |) | |
| |) | |
| v. |) | Criminal No. 19-cr-10063-DJC |
| |) | |
| RANDALL CRATER, |) | |
| |) | |
| Defendant |) | |

GOVERNMENT’S REVISED WITNESS LIST

The government respectfully submits the following list of potential witnesses for the trial scheduled to begin on July 12, 2022. The government reserves the right to supplement this list with reasonable notice to the defendant, and to call additional rebuttal witnesses not identified here.¹

| Name | Entity/Location |
|-------------------------|---------------------------------|
| 1. Abadi, Gavin | Atlanta, Georgia |
| 2. Bell, Peter | Monkton, Maryland |
| 3. Benge, Kimberly | Ronda, North Carolina |
| 4. Brekenfeld, Kathleen | Federal Bureau of Investigation |
| 5. Byrd, Jay | Addison Township, Michigan |
| 6. Cassidy, Brianna | Federal Bureau of Investigation |
| 7. Clegg, Pamela | CipherTrace |
| 8. Desa, David | U.S. Postal Inspection Service |
| 9. Daniels, David | Orlando, Florida |

¹ In particular, the government reserves the right to call Keeper of the Records witnesses to the extent necessary absent stipulations.

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|------------------------|---------------------------------|
| 10. Douglas, James | Oceanside, California |
| 11. Goodfellow, Jenna | Purchase, New York (Mastercard) |
| 12. Guidoboni, Joseph | Internal Revenue Service |
| 13. Lynch, John | Boston, Massachusetts |
| 14. McGowan, Robert | Ledgewood, New Jersey |
| 15. Mendiola, Norman | Blythe, California |
| 16. Mittler, Harrysen | San Clemente, California |
| 17. Olivo, Salvatore | South Hampton, New York |
| 18. Ross, Randall | Varysburg, New York |
| 19. Vlahakis, Theodore | U.S. Treasury (FinCEN) |

Respectfully submitted,

RACHAEL S. ROLLINS
United States Attorney

By: /s/ Christopher J. Markham
CHRISTOPHER J. MARKHAM
Assistant United States Attorneys

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Christopher J. Markham
Christopher J. Markham
Assistant United States Attorney